

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION VIII

999 18th STREET - SUITE 500 DENVER, COLORADO 80202-2405

DEC 2 0 1990

Ref: 8HWM-FF

Mr. Robert M. Nelson, Jr., Manager Department of Energy Rocky Flats Area Office P.O. Box 928 Golden, CO 80402-0928

Re: Operable Unit 2
IM/IRA Responsiveness Summary

Dear Mr. Nelson:

Please find attached EPA's comments on the Responsiveness Summary for the Operable Unit No. 2 Interim Measures/Interim Remedial Action (IM/IRA) plan as released for public comment on 26 September 1990.

As we discussed with your staff, the major change to be made pursuant to public comments is the exclusion of the Woman Creek seeps from this action and the inception of a second IM/IRA to address the Woman Creek seeps. This change must be fully explained and justified based on its technical merits and responsiveness to public concerns.

The new (Woman Creek Seeps) IM/IRA will need to follow the same process of deliverables and reviews applied to the subject plan. EPA requests DOE forward a detailed proposed schedule for the Woman Creek IM/IRA for our review at the earliest possible date, not later than February 15, 1991. The June/July timeframe mentioned for submittal of a draft IM/IRA Decision Document would be considered appropriate on the condition this plan incorporates the results of a comprehensive bench-scale testing program on the spring flows from the Woman Creek seeps.

In addition, the original OU 2 IM/IRA Decision Document as released for comment must be revised to reflect inclusion of the SW21 flows in the Walnut Creek system. This should include an explanation of why this seep was not previously identified as requiring collection and treatment, and why such action is now considered necessary.

If you should have questions regarding our comments, please contact Martin Hestmark or Bill Fraser of my staff at (303) 294-1134 or (303) 294-1132, respectively.

Sincerely,

Louis W. Johnson, Chief

Federal Facilities Remedial Branch

Enclosures

cc: w/Attachment

Martin Hestmark, 8HWM-FF Bill Fraser, 8HWM-FF

Gary Baughman, CDH Tom Greengard, EG&G Frazer Lockhart, DOE Joe Palomba, CDH-RFPU